

1 **REMARKS**

2 Claims 16, 25-26, 29-30, and 53 are amended. Claims 1-15 and 24 are
3 cancelled. Claims 16-23 and 25-58 remain in the application for consideration. In
4 view of the following remarks, Applicant respectfully requests allowance of the
5 subject application.

6

7 **Teleconference with Examiner**

8 Applicant and the Examiner conducted a teleconference on May 29, 2006.
9 During the teleconference, Applicant and the Examiner discussed the references
10 cited by the Office and the Office's position with respect to the subject claims. In
11 the spirit of that discussion, Applicant has amended the claims, as indicated above.
12 The Examiner indicated that he will contact the undersigned if the subject
13 application is not forwarded on to allowance.

14 Applicant is greatly appreciative of the Examiner's time and willingness to
15 advance prosecution in a meaningful and expeditious manner.

16

17 **§ 103 Rejections**

18 Claims 1-58 stand rejected under U.S.C. §103(a) as being unpatentable
19 over U.S. Patent No. 5,537,526 to Anderson et al. (hereafter "Anderson") in view
20 of U.S. Patent No. 5,564,263 to Bergman et al. (hereinafter "Bergman"), and
21 further in view of U.S. Patent No. 6,556,217 to Makipaa et al. (hereinafter
22 "makipaa").

1 The Claims

2 Claim 16, as amended, recites a web content adaptation method comprising
3 [added language in bold italics]:

- 4 • analyzing one or more functions associated with a webpage that is
5 configured for presentation on a first device type, said analyzing
6 being performed by generating one or more function-based object
7 models that represent objects comprising the webpage,
8 ○ said objects comprising:
9 ■ one or more basic objects associated with the webpage, basic
10 objects comprising a smallest information body that cannot be
11 further divided, said one or more basic objects being
12 configured to perform one or more of the following functions:
13 (1) providing semantic information, (1) navigating to other
14 objects, (3) providing a visual effect on the webpage, and (4)
15 enabling user interaction; and
16 ■ one or more composite objects associated with the webpage,
17 composite objects comprising objects that contain other
18 objects, said one or more composite objects having a
19 clustering function that is associated with a webpage author's
20 intention; and
21 • based on said analyzing, adapting the webpage for presentation on a
22 second device type that is different from the first device type,
23 ***wherein said adapting comprises applying one or more rules to
24 said function-based object models.***

25 In making out the rejection of this claim, the Office asserts that its subject matter would have been obvious in view of the teachings of Anderson, Bergman, and Makipaa. First, the Office argues that it would have been obvious to modify Bergman into Anderson "in order to provide a *unified framework*." (emphasis added). Next, the Office notes that Anderson and Bergman "do not explicitly disclose 'adapt the webpage for presentation on a second device type that is different from the first device type.'" The Office refers to Makipaa and asserts that it discloses "adapting page to be displayed based on the device capabilities." The

1 Office then argues that it would have been obvious to have “modified Makipaa
2 into Anderson and Bergman to provide a way to adapt a page *based on device*
3 *capabilities*, as taught by Makipaa, incorporated in the systems of Anderson and
4 Bergman, in order to allow *maximum utilization* of a device for the user.”
5 (emphasis added).

6 Applicant respectfully disagrees and submits that the Office has not
7 established a *prima facie* case of obviousness. First, Applicant is unable to find
8 any reference to “analyzing one or more functions associated with a webpage” in
9 the Anderson reference. Furthermore, the Office characterizes Makipaa as
10 disclosing “adapting page to be displayed based on the device capabilities.”
11 However, applicant fails to understand how this anticipates “analyzing one or
12 more *functions associated with a webpage*” and “*based on said analyzing*,
13 adapting the webpage for presentation on a second device type”, as claimed.
14 (emphasis added).

15 Second, as Applicant noted in its previous response (mailed March 14,
16 2005), the Office has failed to present a convincing line of reasoning that explains
17 *why* it would have been obvious to incorporate these teachings. Specifically, the
18 Office has not explained what a “*unified framework*” is or how the document
19 architecture of Anderson would benefit from the teachings of Bergman. Perhaps
20 more importantly, the stated motivation “to allow *maximum utilization*” simply
21 pertains to improving efficiency – which could be used to justify almost any
22 modification of Anderson and fails to explain *why* the proposed combination
23 would have been obvious.

24 Nevertheless, in the interest of advancing prosecution, Applicant has
25 amended this claim with the subject matter previously recited in claim 24:

1 “*wherein said adapting comprises applying one or more rules to said function-based object models.*” This is simply not disclosed or suggested in the references
2 of record, either singly or in combination with one another.

3
4 In view of the above discussion, the Office has not established a *prima facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

5
6 **Claims 17-23 and 25** depend from claim 16 and are allowable as
7 depending from an allowable base claim. These claims are also allowable for their
8 own recited features which, in combination with those recited in claim 16, are
9 neither disclosed nor suggested in the references of record, either singly or in
10 combination with one another.

11
12 **Claim 26**, as amended, recites a web content adaptation method comprising
[added language in bold italics]:

- 13 • analyzing one or more functions associated with a webpage by
14 generating one or more function-based object models that represent
15 objects comprising the webpage,
 - 16 ○ said objects comprising:
 - 17 ■ one or more basic objects associated with the webpage, basic
18 objects comprising a smallest information body that cannot be
19 further divided, said one or more basic objects being
20 configured to perform one or more of the following functions:
21 (1) providing semantic information, (1) navigating to other
22 objects, (3) providing a visual effect on the webpage, and (4)
23 enabling user interaction; and
 - 24 ■ one or more composite objects associated with the webpage,
25 composite objects comprising objects that contain other
 objects, said one or more composite objects having a
 clustering function that is associated with a webpage author’s
 intention; and
 - 26 • based on said analyzing, adapting the webpage for presentation on a
27 device, *wherein said adapting comprises applying one or more
28 rules to said function-based object models.*

1 In making out the rejection of this claim, the Office relies on the same
2 argument that it made in regard to claim 16. Accordingly, for the reasons given
3 above, Applicant respectfully disagrees with the Office.

4 Nevertheless, in the interest of advancing prosecution, Applicant has
5 amended this claim with the subject matter previously recited in claim 24:
6 ***"wherein said adapting comprises applying one or more rules to said function-***
7 ***based object models."*** This is simply not disclosed or suggested in the references
8 of record, either singly or in combination with one another.

9 In view of the above discussion, the Office has not established a *prima*
10 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

11 **Claims 27-28** depend from claim 26 and are allowable as depending from
12 an allowable base claim. These claims are also allowable for their own recited
13 features which, in combination with those recited in claim 26, are neither disclosed
14 nor suggested in the references of record, either singly or in combination with one
15 another.

16 **Claim 29**, as amended, recites one or more computer-readable ***storage***
17 media having computer-readable instructions thereon which, when executed by
18 one or more processors, cause the one or more processors to [added language in
19 bold italics]:

- 20
- 21 • analyze one or more functions associated with a webpage that is
22 configured for presentation on a first device type by generating one
23 or more function-based object models that represent objects
comprising the webpage,
 - 24 ○ said objects comprising:
 - 25 ■ one or more basic objects associated with the webpage, basic
objects comprising a smallest information body that cannot be
further divided, said one or more basic objects being

- configured to perform one or more of the following functions:
- (1) providing semantic information, (1) navigating to other objects, (3) providing a visual effect on the webpage, and (4) enabling user interaction; and
- one or more composite objects associated with the webpage, composite objects comprising objects that contain other objects, said one or more composite objects having a clustering function that is associated with a webpage author's intention;
 - said generating of the one or more function-based object models comprising generating at least one function-based object model for a basic object, said at least one function-based object model being generated as a function of one or more of the following properties: (1) a presentation property that defines a way in which the object is presented, (2) a semanteme property associated with content of an object, (3) a decoration property pertaining to an extent to which the basic objects serves to decorate the webpage, (4) a hyperlink property pertaining to an object to which the basic object points via a hyperlink, and (5) a interaction property pertaining to an interaction method of the basic object;
 - said generating further comprising generating at least one function-based object model for a composite object, said at least one function-based object model for the composite object being generated as a function of one or more of the following properties: (1) a clustering relationship property pertaining to a relationship among root children of the composite object, and (2) a presentation relationship property pertaining to a presentation order associated with the root children of the composite object;
 - said generating further comprising generating at least one specific function-based object model that serves to categorize an object by:
 - for a basic object, generating said at least one specific function-based object model based upon properties of the basic object and properties associated with any father or brother objects; and
 - for a composite object, generating said at least one specific function-based object model based upon properties of the composite object and any of its root children; and
 - based upon an analysis of said one or more functions, adapt the webpage for presentation on a second device type that is different from the first device type, *wherein said adapting comprises applying one or more rules to said function-based object models.*

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 16. Accordingly, for the reasons given above, Applicant respectfully disagrees with the Office.

Nevertheless, in the interest of advancing prosecution, Applicant has amended this claim with the subject matter previously recited in claim 24: "*wherein said adapting comprises applying one or more rules to said function-based object models.*" This is simply not disclosed or suggested in the references of record, either singly or in combination with one another.

In view of the above discussion, the Office has not established a *prima facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

Claim 30 depends from claim 29 and is allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 29, are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 31 recites a web content adaptation method comprising:

- receiving multiple web pages that are configured for display on a first device type;
- processing the multiple web pages to provide multiple different objects associated with the webpages, individual objects having one or more properties relating to functions of the individual object;
- applying one or more rules to the objects sufficient to provide multiple different webpages that are configured for display on a second device type that is different from the first device type.

In making out the rejection of this claim, the Office relies on the same

1 argument that it made in rejecting claim 16. However, Applicant is confused as to
2 how that argument applies to this claim because this claim and claim 16 do not
3 expressly recite the same subject matter. As such, the Office's argument does not
4 address "receiving multiple web pages", "processing the multiple web pages", or
5 "applying one or more rules to the objects sufficient to provide multiple different
6 webpages", as claimed.

7 Nevertheless, Applicant has thoroughly scrutinized the cited references and
8 submits that they do not disclose or suggest this subject matter. Hence, for at least
9 this reason, the Office has failed to establish a *prima facie* case of obviousness.
10 Therefore, this claim is allowable.

11 **Claims 32-42** depend from claim 31 and are allowable as depending from
12 an allowable base claim. These claims are also allowable for their own recited
13 features which, in combination with those recited in claim 31, are neither disclosed
14 nor suggested in the references of record, either singly or in combination with one
15 another.

16 **Claim 43** recites a web content adaptation method that adapts web content
17 from one format to another, and which uses multiple function-based object models
18 to do so, where the function-based object models comprise models that pertain to
19 (1) basic objects that comprise a smallest information body that cannot be further
20 divided, and (2) composite objects that comprise objects that can contain other
21 objects.

22 In making out the rejection of this claim, the Office relies on the same
23 argument that it made in rejecting claim 16. However, Applicant is confused as to
24 how that argument applies to this claim because this claim and claim 16 do not
25 expressly recite the same subject matter. As such, the Office's argument does not

1 address “a web content adaptation method that adapts web content from one
2 format to another, and which uses multiple function-based object models to do
3 so”, as claimed.

4 Nevertheless, Applicant has thoroughly scrutinized the cited references and
5 submits that they do not disclose or suggest this subject matter. Hence, for at least
6 this reason, the Office has failed to establish a *prima facie* case of obviousness.
7 Therefore, this claim is allowable.

8 **Claim 44** depends from claim 43 and is allowable as depending from an
9 allowable base claim. This claim is also allowable for its own recited features
10 which, in combination with those recited in claim 43, are neither disclosed nor
11 suggested in the references of record, either singly or in combination with one
12 another.

13 **Claim 45** recites a system for adapting web content from one format to
14 another comprising one or more function-based object models, individual
15 function-based object models representing objects that are present in a webpage in
16 terms of one or more of an object’s functional properties.

17 In making out the rejection of this claim, the Office relies on the same
18 argument that it made in rejecting claim 16. However, Applicant is confused as to
19 how that argument applies to this claim because this claim and claim 16 do not
20 expressly recite the same subject matter. As such, the Office’s argument does not
21 address “a system for adapting web content from one format to another comprising
22 one or more function-based object models”, as claimed.

23 Nevertheless, Applicant has thoroughly scrutinized the cited references and
24 submits that they do not disclose or suggest this subject matter. Hence, for at least
25 this reason, the Office has failed to establish a *prima facie* case of obviousness.

1 Therefore, this claim is allowable.

2 **Claims 46-53** depend from claim 45 and are allowable as depending from
3 an allowable base claim. These claims are also allowable for their own recited
4 features which, in combination with those recited in claim 45, are neither disclosed
5 nor suggested in the references of record, either singly or in combination with one
6 another.

7 **Claim 54** recites a computer architecture for use in adapting web content
8 for display on a computing device, the architecture comprising:

- 9 • an analysis module for receiving at least one webpage and
10 processing the one webpage to produce one or more function-based
11 object models that describe functional properties of objects that are
12 contained in the one webpage;
- 13 • one or more rules modules that contain rules that are to be used to
14 adapt content contained in the webpage; and
- 15 • a content adaptation module configured to process the one or more
16 function-based object models in accordance with one or more rules
17 contained in the one or more rules modules to produce a new web
18 page that has been adapted from the one web page.

19 In making out the rejection of this claim, the Office relies on the same
20 argument that it made in rejecting claim 16. However, Applicant is confused as to
21 how that argument applies to this claim because this claim and claim 16 do not
22 expressly recite the same subject matter. As such, the Office's argument does not
23 address "an analysis module", "one or more rules modules", or "a content adaption
24 module", as claimed.

25 Nevertheless, Applicant has thoroughly scrutinized the cited references and
26 submits that they do not disclose or suggest this subject matter. Hence, for at least
27 this reason, the Office has failed to establish a *prima facie* case of obviousness.

1 Therefore, this claim is allowable.

2

3 **Conclusion**

4 All of the claims are in condition for allowance. Applicant respectfully
5 requests a Notice of Allowability be issued forthwith. If the Office's next
6 anticipated action is to be anything other than issuance of a Notice of Allowability,
7 Applicant respectfully requests a telephone call for the purpose of scheduling an
8 interview.

9

10 Respectfully Submitted,

11 Dated: 7-10-06

12 By:

13 
14 Rich Bücher
15 Reg. No. 57,971
16 (509) 324-9256
17
18
19
20
21
22
23
24
25